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April 7, 2025

## Via ECF

The Honorable Valerie Figueredo United States Magistrate Judge Southern District of New York 500 Pearl Street New York, New York 10007

Re: EscapeX IP, LLC v. Google LLC, Civil Action No. 1:23-cv-10839 Letter Motion to Seal Exhibits 1-9 to my Declaration of Today's Date

Your Honor:

In contemplation of this Court's directive that undersigned counsel for Google LLC ("Google") submit for the Court's consideration billing records in support of Google's Motion for Attorneys' Fees [Doc. 54], Google files this motion to seal Exhibits 1-9 to my Declaration submitting the same. As stated in my Declaration, Exhibits 1-9 are redacted copies of invoices submitted by my firm to Google. The invoices reflect information that is confidential to Google and my firm, including work performed by attorneys on Google's behalf and financial arrangements between my firm and Google. Therefore, Google respectfully requests that the Court grant this Motion and maintain Exhibits 1-9 under seal, as no public interest will be served by disclosure of these confidential and sensitive matters on an open docket.

## **Certificate of Conference**

I emailed EscapeX's counsel on April 7, 2025 to confirm my understanding that EscapeX would not oppose Google's request to seal Exhibits 1-9. EscapeX's counsel confirmed that it does not oppose this motion.

**MEMO ENDORSED** 

HON. VALERIE FIGUEREDO UNITED STATES MAGISTRATE JUDGE

Dated: 4/8/2025

The motion to seal is GRANTED. The Clerk of Court is directed to maintain the viewing restrictions at ECF No 63.

The Clerk of Court is respectfully directed to terminate the gavel at ECF No. 62.

Respectfully submitted,

/s/ Jeff Barron

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Attorneys for Google LLC